

RETURN OF SERVICE

**UNITED STATES DISTRICT COURT
Northern District of Illinois**

Case Number: 12C05836

Plaintiff:

Dr. Nicholas Angelopoulos

vs.

Defendant:

**Keystone Orthopedic Specialists, S.C.; Martin R. Hall; and Wachs,
LLC,**

For:

**Gair Eberhard Nelson Dedinas, Ltd
1 East Wacker Drive
Suite 2600
Chicago, IL 60601**

Received by Clutter Investigations Inc. DBA Courthouse Courier on the 7th day of August, 2018 at 12:26 pm to be served on **First Midwest Bank, 8750 Bryn Mawr, Suite 1300, Chicago, IL 60631.**

I, Kyle Clutter, do hereby affirm that on the **13th day of August, 2018 at 10:25 am, I:**

served an **AUTHORIZED** entity by delivering a true copy of the **Third Party Citation to Discover Assets with Schedule of Documents** with the date and hour of service endorsed thereon by me, to: **Alyssa Casaccio as Authorized Agent** at the address of: **8750 Bryn Mawr, Suite 1300, Chicago, IL 60631,** who stated they are authorized to accept service for **First Midwest Bank,** and informed said person of the contents therein, in compliance with all applicable law.

I being first duly sworn on oath, states that I am over 18 years of age and not a party to this lawsuit. Under penalties of perjury as provided by law, pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the above statement is true and correct.



Kyle Clutter
115-002370

**Clutter Investigations Inc. DBA Courthouse
Courier
1 West Old State Capitol Plaza
Suite 818
Springfield, IL 62701
(217) 528-5997**

Our Job Serial Number: CLU-2018001505



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Dr. Nicholas Angelopoulos

Plaintiff,

Case No. 12 C 05836

v.

Honorable Robert M. Dow

Keystone Orthopedic Specialists, S.C.; Martin
R. Hall; and WACHN, LLC,

Defendants.

Third Party Citation to Discover Assets

To: First Midwest Bank, 8750 Bryn Mawr, Suite 1300, Chicago, IL 60631.

YOU ARE COMMANDED to produce the requested documents on or before August 28, 2018 at the law offices of Gair Eberhard Nelson Dedinas, Ltd, 1 East Wacker Drive, Suite 2600, Chicago, IL 60601 concerning the property or income or indebtedness due to Nicholas Angelopoulos.

A judgment in favor of Nicholas Angelopoulos and against Keystone Orthopedic Specialists, S.C. was entered on July 23, 2018 as follows: Count I: \$178,594.29; Count II: \$560,034.46; Count VI: \$454,000; and for discovery sanctions of \$25,175, and the entire judgment remains unsatisfied. Judgement was further entered against Martin R. Hall as follows: Count I: \$178,594.29; Count II: \$1,560,034.46; Count III: \$410,777.17 by virtue of Hall's position with WACHN and \$709,294.75 by virtue of Hall's position with Keystone, plus punitive damages of \$1,000,000; and for discovery sanctions of \$25,175, and the entire judgment remains unsatisfied. Judgment was further Entered against WACHN, LLC as follows: Count V: \$111,000; and discovery sanctions of \$25,175, and the full amount remains unsatisfied.

YOU ARE COMMANDED to produce all books all books, papers, or records in your possession or over which you have control, which may contain information concerning the property of judgment debtors which indicates that you are indebted to or holding any funds for the judgment debtors, including those materials listed on the attached schedule of documents

YOU ARE PROHIBITED from making or allowing any transfer or other disposition of, or interfering with, any property not exempt from the enforcement of a judgment therefrom, a deduction order or garnishment, belonging to the judgment debtors or to which he, she or it may be entitled or which may thereafter be acquired by or become due to him, her or it, and from paying over or otherwise disposing of any moneys not so exempt which are due or to become due to the judgment debtors, until the further order of the court or the termination of the proceeding whichever occurs first. The third party may not be obliged to withhold the payment on any moneys beyond double the amount of the balance due sought to be enforced by the judgment creditor.

Warning

IF YOU FAIL TO APPEAR AS DIRECTED IN THIS NOTICE, YOU MAY BE ARRESTED AND BROUGHT BEFORE THE COURT TO ANSWER TO A CHARGE OF CONTEMPT OF COURT, WHICH MAY BE PUNISHABLE BY IMPRISONMENT. YOUR FAILURE TO COMPLY WITH THE CITATION PROCEEDING MAY RESULT IN A JUDGMENT BEING ENTERED AGAINST YOU FOR THE UNSATISFIED AMOUNT OF THE JUDGMENT

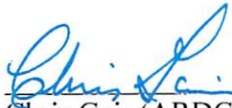
Certificate of Attorney for Judgment Creditor

Amount of Judgment	Against Keystone Orthopedic Specialists, S.C.: Count I: \$178,594.29; Count II: \$560,034.46; Count VI: \$454,000; and for discovery sanctions of \$25,175, Against Martin R. Hall: Count I: \$178,594.29; Count II: \$1,560,034.46; Count III: \$410,777.17 by virtue of Hall's position with WACHN and \$709,294.75 by virtue of Hall's position with Keystone, plus punitive damages of \$1,000,000; and for discovery sanctions of \$25,175, Against WACHN, LLC: Count V: \$111,000; and discovery sanctions of \$25,175.
Balance Due	Full amount remains due.
Date of Judgment	July 23, 2018
Court Entering Judgment	United States District Court for the Northern District of Illinois
Case Number	12 C 05836

Dated: August 7, 2018

Certificate of Attorney

The undersigned certifies, under penalty of perjury, that the information contained herein is true and correct.



Chris Gair (ARDC # 6190781)
Thomas R. Heisler (ARDC # 6296712)
Ryan P. Laurie (ARDC # 6318306)
Gair Eberhard Nelson Dedinas Ltd
1 East Wacker Drive, Suite 2600
Chicago, IL 60601
(312) 600-4900

THOMAS G BRUTON

Clerk of the United States District Court
for the Northern District of Illinois



AUG 07 2018

Schedule of Documents

First Midwest Bank
8750 Bryn Mawr, Suite 1300
Chicago, IL 60631

For the time period from November 1, 2011 to present

Relevant Persons:

- a. Martin R. Hall (SSN [REDACTED])
 - b. Diane M. Hall (SSN [REDACTED])
 - c. Jennifer A. Hall (partial SSN [REDACTED])
 - d. Kelly E. Hall (partial SSN [REDACTED])
 - e. Samantha R. Hall (partial SSN [REDACTED])
 - f. Keystone Orthopedic Specialists, SC (EIN [REDACTED])
 - g. WACHN, LLC (EIN [REDACTED])
 - h. Martin R. Hall MD SC (EIN [REDACTED])
 - i. Medstaff Supply, Inc. (EIN [REDACTED])
 - j. The Diane M. Hall Trust dated January 26, 1999
 - k. Diane M. Hall Trust Number One
 - l. Advanced Orthopedic Specialists, S.C.
 - m. Vertical Plus MRI
 - n. Midwest Diagnostics
 - o. Scan Partners, Inc.
 - p. Clinical Regenerative Medicine Center, LLC
 - q. Magnetic Partners, LLC
 - r. Midwest Physical Therapy, Inc.
 - s. Upright MRI of Hazel Crest, LLC
 - t. Iliana Surgery Center
 - u. Tinley Woods LLC
 - v. 3838 Main Street Development, LLC
 - w. Varsity Medical Center
 - x. Any trust account in which any of the individuals identified in (a) to (e) is the settlor, executor, grantor, beneficiary, protector, or trustee
 - y. Any successor to the above
-
- 1. All account opening documents, signature cards, and account statements for any account held in the name of or for the benefit of the Relevant Persons or any other account in which Martin Hall or Diane Hall has signatory authority
 - 2. All deposit or transfer items in excess of \$1000 paid to accounts relating to Relevant Persons (b) through (e) which deposit or transfer relates to a check or other instrument issued by Relevant Persons (a) or (f) through (y).

3. All personal or company financial statements prepared or submitted by or on behalf of or relating to the Relevant Persons.
4. All loan documents, loan statements, or loan applications relating to any of the Relevant Persons.
5. All credit approvals, credit reviews, or credit relationship summaries.
6. Documents sufficient to identify the collateral relating to any loans relating to the Relevant Persons.
7. All trust documents relating to Relevant Persons (a) through (e).